



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

March 10, 2011

Michael L. Rassbach
District Ranger, Walla Walla Ranger District
Umatilla National Forest
1415 West Rose St
Walla Walla, Washington 99362

Re: EPA comments on the North End Sheep Allotment Draft Environmental Impact Statement (DEIS), EPA Project Number: 09-020-AFS.

Dear Mr. Rassbach,

The U.S. Environmental Protection Agency (EPA) has reviewed the DEIS for the **North End Sheep Allotment** in the Walla Walla Ranger District of the Umatilla National Forest in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The DEIS evaluates four alternatives related to continuation of domestic sheep grazing on the North End allotment and a "no grazing" alternative. The key issue identified relate to potential interaction of domestic sheep with Rocky Mountain bighorn sheep from continuing grazing. The Preferred Alternative is identified as Alternative 4, which includes the greatest reduction in acres available for grazing and eliminates grazing in the North Fork Umatilla Wilderness Area.

EPA supports the reduction in grazing to protect bighorn sheep range from risk of disease; however, we are concerned with the inherent level of risk if interaction occurs. The EIS is very clear about the risk of disease spread and impacts to bighorn sheep and defines effective separation as "spatial and/or temporal separation between wild sheep and domestic sheep or goats, resulting in (at most) a minimal risk of potential respiratory disease transmission." We support measures to effectively separate species and the proposed management measures appear to ensure this. Monitoring, successful implementation of management measures and adaptive management/further reduced grazing if necessary are critical to maintain bighorn sheep viability. Monitoring is a key component in determining whether or not management strategies are effective and also in determining the accuracy of modeling. We appreciate the inclusion of management requirements and we recommend that the EIS also include information on a proposed monitoring plan, including how monitoring will be funded, who will conduct monitoring, how often, and how results will be used to adapt management strategies.

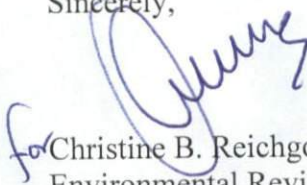
The EIS did not include water quality as a key concern due to requirements currently in place to protect water quality. The section on water quality states that the State of Oregon has developed Total Maximum Daily Loads (TMDLs) for the Upper Grande Ronde Subbasin, Umatilla Subbasin, and the Walla Walla Subbasin. However, the parameters that these subbasins are listed for and detail on individual streams are not included. The EIS also states that the allotment boundaries do not include any water temperature or sediment water quality impaired streams. The EIS should further discuss the TMDL parameters and load allocations in the project area. The EIS discusses best management practices (BMPS) to protect water quality and aquatic habitat and includes Figure 17 which illustrates the stream network and critical habitat for steelhead and bull trout. We support the BMPs and timing restrictions of when stream crossing by domestic sheep are allowed. We recommend that the EIS also include a figure illustrating which streams are impaired in the watershed with an overlay of allotment boundaries to better understand the potential impacts from grazing on water quality in the project area.

The EIS includes a "no grazing" alternative (Alternative 5) and states that this is the no action alternative analyzed as required by the Council of Environmental Quality and per USDA Forest Service Handbook. The no action alternative can also be interpreted as no change in current management per CEQ's "NEPA's Forty Most Asked Questions." The EIS does not appear to discuss current management and allotment boundaries other than to discuss the history of grazing in the region. Because Alternative 5 is based on no grazing, we are unclear what the implications of current management are and are not able to understand how the alternatives compare to what has occurred in the Forest and how alternatives would affect current issues and impacts. The EIS should provide more detail regarding current management and consider including an alternative that analyzes this and contrasts it with the proposed alternative so that the environmentally preferable alternative can be identified in the final EIS.

Because of concerns with potential risk of interaction between domestic and bighorn sheep and lack of site-specific monitoring data and the need for additional information on water quality, we have assigned a rating of EC-2 (Environmental Concerns - Insufficient information) to the Preferred Alternative, Alternative 4.

Thank you for the opportunity to review this draft EIS. If you would like to discuss these issues, please contact me at (206) 553-1601 or Lynne McWhorter of my staff at (206) 553-6382 or by email at mcwhorter.lynne@epa.gov.

Sincerely,



for Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

